

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

In re: §
§ Chapter 7
A+ PRO RECOVERY AND TOWING LLC §
§ Case No. 22-10132
Debtor. §

TRUSTEE'S NOTICE OF INTENT TO CONDUCT A RULE 2004 EXAMINATION

To: A+ Pro Companies, LLC, c/o Registered Agents, Inc., 5900 Balcones Drive, Suite 100, Austin, TX 78731; A+ Pro Companies, LLC, c/o Jody Sean McIntyre, 2216 Padre Blvd, Ste B 158, South Padre Island, TX 78597-0204; A+ Pro Companies, LLC, c/o Castine McIlHargey, 2216 Padre Blvd, Ste B 158, South Padre Island, TX 78597-0204

PLEASE TAKE NOTICE that Catherine Curtis (the “**Trustee**”), the chapter 7 trustee for the estate of A+ Pro Recovery and Towing LLC (the “**Debtor**”), files this *Notice of Intent to Conduct a Rule 2004 Examination* (the “**Notice**”).

PLEASE TAKE FURTHER NOTICE this Notice was filed on February 20, 2023 and that per Fed. R. Bankr. P. 2004 and the Southern District of Texas’ Local Bankruptcy Rule 2004-1, 14-days’ notice must be given to A+ Pro Companies, LLC.

PLEASE TAKE FURTHER NOTICE that A+ Pro Companies, LLC is to direct its response to Trustee’s counsel, J. Maxwell Beatty, The Beatty Law Firm PC, at 1127 Eldridge Pkwy, Suite 300 #383, Houston, Texas 77077 or via email at max@beattypc.com.

PLEASE TAKE FURTHER NOTICE if A+ Pro Companies, LLC does not serve a response, then the notice to conduct an examination is deemed ordered without require the entry of an order by the Court.

PLEASE TAKE FURTHER NOTICE that after the 14-day notice period, the Trustee will serve **Exhibit 1** upon A+ Pro Companies, LLC seeking the production of certain documents identified in **Exhibit 1**.

Date: February 20, 2023

THE BEATTY LAW FIRM PC

By: /s/J. Maxwell Beatty

J. Maxwell Beatty

State Bar No. 24051740

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Houston, Texas 77077

Tel. 832-529-3381

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Counsel for the Chapter 7 Trustee

CERTIFICATE OF CONFERENCE

I certify that, on February 15, 2023, I attempted to confer with Jody McIntyre and Castine McIlhargey regarding a reasonable examination schedule, including the dates for production, by sending an email to all known email addresses for each person. Mr. McIntyre stated he was no longer a member of the company, and he did not raise any objection to the proposed schedule. Ms. McIlhargey did not respond.

/s/ J. Maxwell Beatty

J. Maxwell Beatty

CERTIFICATE OF SERVICE

I certify that, on February 20, 2023, a true and correct copy of this *Notice of Intent to Conduct a Rule 2004 Examination* was served upon all parties who have requested electronic notice through the Court's ECF system. In addition, a copy was served via U.S. Mail and via email as follows:

A+ Pro Companies, LLC
c/o Registered Agents, Inc.
5900 Balcones Drive, Suite 100
Austin, TX 78731

A+ Pro Companies, LLC
c/o Jody Sean McIntyre
2216 Padre Blvd, Ste B 158
South Padre Island, TX 78597-0204
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A+ Pro Companies, LLC
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/s/ J. Maxwell Beatty

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